

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

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v.

Criminal No: 1:20-CR-10136-RGS-15

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RUSSELL HANKERSON
Defendant.

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MOTION TO AMEND CONDITIONS OF RELEASE

NOW COMES the Defendant, Russell Hankerson, by and through his attorney, Paul Garrity, and moves this Court to amend his conditions of release to authorize him to attend a Super Bowl gathering from 6:00 p.m. to 11:00 p.m. on February 7, 2021.

In support of this motion, the Defendant states as follows:

1. The Defendant currently has a curfew from 9:00 p.m. to 7:00 a.m.
2. The Defendant has informed the undersigned counsel that he has been invited to attend a Super Boal gathering on February 7, 2021 at the home of Debra Swain at 42 Waverly Street, Roxbury, MA. The gathering is scheduled to start at 6:00 p.m. and end at 11:00 p.m.
3. Probation Officer Erin Hennemann has been contacted regarding this motion and takes no position. PO Hennemann also stated that the Defendant is in compliance with his conditions of release.
4. Assistant US Attorney Tim Moran was contacted on February 4, 2021 regarding this motion and informed the undersigned counsel that he did not object to this motion so long as the Defendant's probation officer did not object and that the Defendant complies with COVID-19 guidelines. In light of Probation Officer Hennemann taking no position on this

motion, the undersigned counsel attempted to contact AUSA Moran to determine whether his position would not be different in light of Probation Officer Hennemann's current non-position. As of the time of the filing of this motion, the undersigned counsel has not heard back from AUSA Moran.

WHEREFORE the Defendant respectfully requests that this Honorable Court grant the within motion and amend his conditions of release for the Super Bowl on February 7, 2021 by extending his curfew from 9:00 p.m. to 11:00 p.m.

Respectfully submitted
Russell Hankerson,
By his Attorney,

Date: February 5, 2021

/s/ Paul J. Garrity
Paul J. Garrity
Bar No. 555976
14 Londonderry Road
Londonderry, NH 03053
603-434-4106

CERTIFICATE OF SERVICE

I, Paul J. Garrity, herein certify that on this 5th day of February, 2021, a copy of the within Motion was e-filed for all parties involved and mailed, postage pre-paid, to Russell Hankerson.

Date: February 5, 2021

/s/ Paul J. Garrity
Paul J. Garrity